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[Proposed] Attorneys for Debtors  
 and Debtors in Possession

UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA  
 SOUTHERN DIVISION

In re:

THE RHODES COMPANIES, LLC, aka  
 "Rhodes Homes," et al.,<sup>1</sup>

Debtors.

Case No.: BK-5-09-14814-LBR  
 (Jointly Administered)

Chapter 11

Affects:

- ☒ All Debtors  
☐ Affects the following Debtor(s)

**STATEMENT OF PACHULSKI STANG  
 ZIEHL & JONES LLP UNDER RULE 2016  
 OF THE FEDERAL RULES OF  
 BANKRUPTCY PROCEDURE AND  
 SECTION 329 OF THE BANKRUPTCY  
 CODE RE "APPLICATION OF DEBTORS  
 AND DEBTORS IN POSSESSION TO  
 EMPLOY AS GENERAL BANKRUPTCY  
 COUNSEL NUNC PRO TUNC TO THE  
 PETITION DATE"**

<sup>1</sup> The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-

1           1.       Pachulski Stang Ziehl & Jones LLP ("PSZ&J"), pursuant to Rule 2016 of the Federal  
2 Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 329 of chapter 11 of title 11 of  
3 the United States Code (the "Bankruptcy Code"), states that the undersigned is counsel to the above-  
4 captioned debtors and debtors in possession (the "Debtors") in these cases.

5           2.       Compensation agreed to be paid by the Debtors to PSZ&J is for legal services to be  
6 rendered in connection with these cases. The Debtors have agreed to pay PSZ&J for the legal  
7 services rendered or to be rendered by its various attorneys, paralegals, and case management  
8 assistants in connection with these cases on the Debtors' behalf. The Debtors also have agreed to  
9 reimburse PSZ&J for its actual and necessary expenses incurred in connection with these cases.

10          3.       PSZ&J has received advance payments from the Debtors during the year prior to the  
11 Petition Date in the amount of \$1,149,893, including the Debtors' aggregate filing fees for these  
12 Cases, in connection with its prepetition representation of the Debtors (the "Advance Payment  
13 Retainer"). PSZ&J is current as of the Petition Date and \$925,719 remains under the Advance  
14 Payment Retainer as of the Petition Date. The Advance Payment Retainer is not a fixed price for  
15 counsel's services, and the Firm reserves the right to seek additional compensation beyond the  
16 amounts covered by the Advance Payment Retainer in accordance with applicable provisions of the  
17 Bankruptcy Code and Bankruptcy Rules.

18          4.       PSZ&J will seek approval of payment of compensation upon the filing of appropriate  
19 applications for allowance of interim or final compensation pursuant to sections 330 and 331 of the  
20 Bankruptcy Code, the Bankruptcy Rules, the Local Rules United States Bankruptcy Court for the  
21 District of Delaware, and orders of this Court.

22          5.       The filing fees for each of the Debtors in these cases have been paid in full.

23          6.       The services to be rendered include all those services set forth in the Application of  
24 Debtors and Debtors in Possession to Employ Pachulski Stang Ziehl & Jones LLP as General  
25 Bankruptcy Nunc Pro Tunc to the Petition Date, submitted concurrently herewith.

26  
27 14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No.  
28 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-  
14884); and Pinnacle Grading, LLC (Case No. 09-14887).

